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*[Additional Counsel on Signature Pages]*

13  
14 **UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

15 RAUL PIZANA, MAUREEN HOBBS,  
16 CHARLES BERGLUND, JEANETTE MILLS,  
17 ERICA LAROCHE, ANNE MARIE LYNCH,  
OSKAR LAFFONT, SAL MUNOZ, and KEITH  
18 BARNES, *individually and on behalf of all  
others similarly situated,*

19 Plaintiffs,

20 v.

21 BASIC RESEARCH, LLC; BR COS LLC;  
22 BASIC RESEARCH HOLDINGS, LLC; BASIC  
RESEARCH INTERMEDIATE, LLC; SIERRA  
23 RESEARCH GROUP, LLC; MAJESTIC  
MEDIA, LLC; CRM SPECIALISTS, LLC;  
24 BYDEX MANAGEMENT, LLC; SANMEDICA  
INTERNATIONAL, LLC; LIMITLESS  
25 WORLDWIDE, LLC; NOVEX BIOTECH,  
L.L.C; BODEE GAY; GINA DAINES; HALEY  
26 BLACKETT; KIMM HUMPHRIES; and  
MITCHELL K. FRIEDLANDER,

27 Defendants.

Case No.: 1:18-cv-00644-ADA-SKO

Case Filed: May 9, 2018

FAC Filed: June 30, 2018

SAC Filed: November 13, 2019

TAC Filed: May 18, 2022

*Assigned to United States District Court  
Judge Ana de Alba and Magistrate Judge  
Shelia K. Oberto*

**JOINT STIPULATION REGARDING  
MOTION PRACTICE RELATED TO  
THE THIRD AMENDED  
COMPLAINT; ORDER**

**(Doc. 241)**

**JOINT STIPULATION REGARDING MOTION PRACTICE RELATED TO THE  
THIRD AMENDED COMPLAINT**

Plaintiffs Raul Pizana, Maureen Hobbs, Charles Berglund, Jeanette Mills, Erica LaRoche, Anne Marie Lynch, Oskar Laffont, Sal Munoz, and Keith Barnes (collectively, “Plaintiffs”) and Limitless Worldwide, LLC, through their respective counsel of record, hereby stipulate and agree as follows:

Whereas the Court has set a briefing schedule for various motions to dismiss, strike, and/or transfer (ECF Nos. 217, 218, 220, 221, 222, 224-1, 230, 231) the Third Amended Complaint (“TAC”) such that Plaintiffs’ oppositions to Defendants’ motions are due on or before October 21, 2022; and Defendants’ replies are due on or before November 18, 2022. (ECF No. 206.)

Whereas Limitless filed a Notice of Joinder in specified portions of the motions to dismiss filed by certain other Defendants on September 1, 2022. (ECF No. 234.)

Whereas Limitless filed a Motion for Judgment on the Pleadings regarding the TAC on September 2, 2022. (ECF No. 237.)

Whereas on September 6, 2022, this Court issued an order that Limitless’s Motion for Judgment on the Pleadings will be decided on the papers. (ECF No. 238.)

Whereas in order to promote the efficient advancement of this action, Plaintiffs and Limitless agree that briefing on Limitless’ Notice of Joinder (ECF No. 234) and Motion for Judgment on the Pleadings (ECF No. 237) should be set to match the briefing schedule for the other Defendants’ motions related to the TAC—i.e., Plaintiffs’ oppositions due on October 21, 2022, and Defendants’ replies due on November 18, 2022.

Whereas this stipulated schedule does not impact any other parties other than Plaintiffs and Limitless.

Whereas as the parties expressly reserve all rights and preserve all arguments with regard to the anticipated motion practice.

Whereas this stipulation is entered into in good faith and not for purposes of delay.

1 **WHEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:**

- 2       • Plaintiffs' opposition to Limitless's Notice of Joinder and Motion for Judgment on the
- 3       Pleadings shall be filed on or before October 21, 2022.
- 4       • Limitless's reply in support of Motion for Judgment on the pleadings shall be filed by
- 5       November 18, 2022.
- 6       • The parties expressly reserve all rights and preserve all arguments with regard to the
- 7       anticipated motion practice.

8 Dated: September 9, 2022

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***Attorneys for Plaintiffs***

22 Dated: September 9, 2022

/s/ Chad Nydegger (as authorized on Sept. 9, 2022)

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***Attorney for Defendant Limitless Worldwide,  
LLC***

**ORDER**

**Based on the foregoing stipulation of the parties (Doc. 241) and good cause appearing,  
IT IS HEREBY ORDERED:**

- Plaintiffs' opposition to Limitless Worldwide, LLC's Notice of Joinder and Motion for Judgment on the Pleadings shall be filed on or before October 21, 2022.
- Limitless Worldwide, LLC's reply in support of its Motion for Judgment on the pleadings shall be filed by November 18, 2022.

IT IS SO ORDERED.

Dated: **September 12, 2022**

**/s/ Sheila K. Oberto**  
UNITED STATES MAGISTRATE JUDGE